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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 MARC GALLI,

13 Plaintiff,

CASE NO. 2:22-cv-00023-APG-NJK

14 v.

15 ANTHONY RUSH, individually and in his
16 official capacity; EDWARD PICKUP,
17 individually and in his official capacity;
18 HENDERSON FIRE DEPARTMENT, a
19 municipal entity; MARISSA MEYERS,
20 individually and in her official capacity; and
JOSHUA FILSINGER, individually and in his
official capacity; HENDERSON POLICE
DEPARTMENT, a municipal entity; CITY
OF HENDERSON, a municipal entity; and
DOE DEFENDANTS I – X,

21 Defendants.
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**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE (FIRST REQUEST)**

23 Plaintiff MARC GALLI, by and through his attorneys of record, Lisa A. Rasmussen, Esq., of
24 the Law Office of Kristina Wildevelde and Associates; and Defendants ANTHONY RUSH,
25 EDWARD PICKUP, HENDERSON FIRE DEPARTMENT, MARISSA MYERS, JOSHUA
26 FILSINGER, HENDERSON POLICE DEPARTMENT AND CITY OF HENDERSON (hereinafter
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collectively referred to as “Henderson Defendants”), through their attorney of record, Brian R. Reeve, Assistant City Attorney, hereby STIPULATE AND AGREE to extend the dispositive motion deadline for a period of six weeks, the new date being September 21, 2022. This is the first stipulation to extend the dispositive motion deadline.

I. DISCOVERY COMPLETED TO DATE

Pursuant to LR 26-3(a), the parties have completed the following discovery:

- A. Plaintiff produced his FRCP 26(a)(1) initial disclosures on February 22, 2022.
- B. Defendants produced their FRCP 26(a)(1) initial disclosures on February 22, 2022.
- C. On April 29, 2022, Plaintiff produced a first supplement to his initial disclosures.
- D. On May 4, 2022, Defendants produced a first supplement to their initial disclosures.
- E. On June 16, 2022, Defendants produced a second supplement to their initial disclosures.
- F. On June 30, 2022, Defendants produced a third supplement to their initial disclosures.
- G. On March 31, 2022, Defendants propounded Interrogatories, Requests for Production of Documents and Requests for Admission on Plaintiff. Plaintiff provided his responses to the Interrogatories, Requests for Production of Documents and Requests for Admission on April 29, 2022.
- H. On June 6, 2022, Plaintiff propounded Interrogatories on Defendants Anthony Rush and Edward Pickup. Defendants provided their responses on July 11, 2022.
- I. On June 9, 2022, Plaintiff propounded Requests for Production of Documents on Defendants Henderson Fire Department and Henderson Police Department. Defendants provided their responses on July 11, 2022.
- J. On May 24, 2022, Plaintiff produced his FRCP 26(a)(2) Expert Witness Disclosures.

1 K. On May 25, 2022, Defendants produced their FRCP 26(a)(2) Expert Witness
2 Disclosures.

3 L. On June 21, 2022, Defendants took Plaintiff's deposition.

4 M. On June 22, 2022, Defendants took the deposition of Plaintiff's wife, Doreen Galli.

5 N. On June 30, 2022, Plaintiff took Defendant Edward Pickup's deposition.

6 O. On July 5, 2022, Plaintiff took Defendant Anthony Rush's deposition.

7 P. On various dates throughout the discovery period, Defendants noticed and served
8 subpoenas duces tecum on Plaintiff's medical providers.
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10 **II. DISCOVERY REMAINING TO BE COMPLETED:**

11 There is no discovery remaining to be completed. The discovery period closed on July 11,
12 2022.

13 **III. REASONS WHY THE PARTIES WISH TO EXTEND THE DISCOVERY**
14 **DEADLINES:**

15 Good cause exists to extend the dispositive motion deadline due to the volume of discovery
16 in this case and to accommodate Defendants' counsel's travel plans.
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18 **IV. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:**

19 The Parties stipulate, agree and request that the dispositive motion deadline be extended for
20 a period of six weeks. The current dispositive motion deadline is August 10, 2022. The proposed
21 dispositive motion deadline is September 21, 2022.

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1 This stipulation is entered into in good faith and not for any improper purpose. This
2 Stipulation is timely filed more than 21 days prior to the dispositive motion deadline.
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4 DATED this July 12, 2022.

DATED this July 12, 2022.

5 CITY OF HENDERSON

THE LAW OFFICES OF KRISTINA WILDEVELD

6 /s/ Brian R. Reeve

/s/ Lisa A. Rasmussen

7 **BRIAN R. REEVE**

LISA A. RASMUSSEN

8 Assistant City Attorney

Nevada Bar No.

9 Nevada Bar No. 10197

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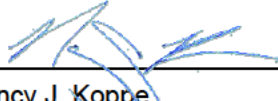
12 Attorneys for Defendants

Attorneys for Plaintiff

13 City of Henderson et al

Marc Galli

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15 IT IS SO ORDERED.
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Nancy J. Koppe

United States Magistrate Judge

Dated: July 13, 2022